



Eastern Band of Cherokee Indians
Tribal Historic Preservation Office
P.O. Box 455
Cherokee, NC 28719
Ph: 828-554-6852 Fax 828-488-2462

DATE: 3 - January - 08

RECEIVED
Division of Highways

TO: Federal Highway Administration
North Carolina Division
Donnie Brew
310 Newbern Ave.
Suite 410
Raleigh, NC 27601

JAN 07 2008

Preconstruction
Project Development and
Environmental Analysis Branch

PROJECT(s): Comments regarding the *Cultural Resources Survey Report, Secondary Road Improvements To Needmore Road, St. Rt. 1364 / St. Rt. 1114, Macon & Swain Counties, North Carolina.*

The Tribal Historic Preservation Office of the Eastern Band of Cherokee Indians would like to thank you for the opportunity to comment on this proposed Section 106 activity under 36 C.F.R. 800.

The proposed undertaking lies within the heart of the Cherokee Middle Towns. This region is especially sensitive for the Eastern Band of Cherokee Indians because many Tribally enrolled families trace their lineage through Middle Town Cherokees. It is evident that the State of North Carolina Department of Transportation Archeology Group went to great lengths to provide a thoroughly researched and meticulously constructed document that reflects the cultural importance of both the Little Tennessee and Tellico Creek valleys.

The region is not only vital for the cultural and interpretative significance it can provide for our sovereign American Indian nation, but also serves as a representation of early United States federal treaty policies. The Treaties of 1817 and 1819 created 640 acre individual life reserves for those Cherokees who agreed to sign the treaties. Of the 51 individual reserves in North Carolina, 21 were created within close proximity of the proposed federal undertaking. According to the information provided, the proposed undertaking transects the reserves of Oo – san – ter – take and Yellow Bear.

It is very apparent by the carefully constructed Cultural Resources Survey that the NCDOT appreciated the sensitive nature of the region for both the enrolled members of the EBCI, and for the citizens of North Carolina. While this office concurs with the archeologist's recommendations that only one site, 31MA585, was considered eligible, NCDOT went above and beyond to construct a document that thoroughly addressed the multi faceted history of the Little Tennessee and Tellico Creek valleys. It is the opinion of the EBCI THPO that this report should be held as a standard for a concise, and comprehensively constructed document that represents not only the letter of Section 106 of the NHPA, but also appreciates the nature of the law.